

ATTACHMENT 20

APPENDIX A

Section 1: Attachment 1 - Facility Description

The permit modification to idle portions of the facility did not affect Attachment 1 of the Permit. The Permittee is subject to Attachment 1 of the Permit issued November 1, 1991, as amended.

Section 2: Attachment 2 - Waste Analysis Plan

The permit modification to idle portions of the facility did not affect Attachment 2 of the Permit. The Permittee is subject to Attachment 2 of the Permit issued November 1, 1991, as amended.

Section 3: Attachment 3 - Security Procedures

Attachment 3 was modified to reflect the elimination of the requirement for warning signs on each of the hazardous waste management units within the fence line of the facility. The inspection form and drawing showing emergency equipment for Unit 255, found in Attachment 4 and Attachment 7 respectively, will continue to show the requirement for warning signs at the entrance since it is located outside the facility fence line. The Permittee is subject to Attachment 3 of the Permit issued November 1, 1991, as amended.

Section 4: Attachment 4 - Inspection Plan

Attachment 4, Appendix E was modified to reflect changes in the inspection of safety equipment. Specifically, the requirement to verify the presence of warning signs at each of the waste management units within the fence line of the facility has been eliminated. The inspection forms located in Attachment 4, Appendix E were modified to reflect this change.

In addition, idling of the facility or portions of it, affects the inspections conducted. The table found below contains the inspections required when the units identified in Condition X.B.1. of the Permit are all idled. The inspection forms follow the table. If the units specified in Condition X.B.1. are not idled simultaneously, until a specific unit is idled, the Permittee is required to use the applicable forms located in Appendix E of Attachment 4.

If additional operational units are idled at a later date, the list of inspection forms will be modified to reflect the change. If an operational unit that is idled is reactivated, the table below will be modified to reflect the inspections associated with the remaining idled units. A new monthly inspection has been added to verify that idled units are not deteriorating. The form, identified as IDLE, is found in the table below.

Unit #	Description	Inspection Frequency	Inspection Form Used	Revision Date
Unit 033	Incineration System, APCS, and Associated Feed Equipment Inspection Record	Daily	0ID1	02/23/96
Unit 105	Container and Area Inspection Log	Daily	1RD2	12/04/95
Unit 106	Container and Area Inspection Log	Daily	1RD3	10/14/98
Units 531-534, 531/532 Tanker Unloading Area Unloading Area and Emergency Equipment/Units 536 Tanker Unloading Area and 535 Tanker Transfer and Storage Area		Daily	i5SD3	12/01/98
Unit 604	Truck Wash Tank Farm/Unload Areas and Emergency Equipment Inspection Record	Daily	6RD1	12/04/95
	Perimeter and General Facility Inspection Record - Receiving Areas	Daily	ARD1	12/04/95
Unit 105	Container and Area Inspection Record	Weekly	1RW2	12/04/95
Unit 106	Container and Area Inspection Record	Weekly	1RW3	11/24/97
	Perimeter and General Facility Security, Safety and Emergency Equipment Inspection Record	Weekly	AXW1	12/01/95
	General Facility - Idled Units Inspection Record	Monthly	IDLE	10/15/98
Unit 033	Safety and Emergency Equipment Inspection Record	Monthly	0IM2	11/24/97
Unit 052 (Laboratory Area)	Safety and Emergency Equipment Inspection Record	Monthly	0LM1	11/24/97
Unit 061	Safety and Emergency Equipment Inspection Record	Monthly	0MM1	11/24/97
Unit 053	Safety and Emergency Equipment Inspection Record	Monthly	0RM1	12/08/95
Unit 071/537	Safety and Emergency Equipment Inspection Record	Monthly	0SM2	11/24/97

Unit #	Description	Inspection Frequency	Inspection Form Used	Revision Date
Unit 051/054	Safety and Emergency Equipment Inspection Record	Monthly	0XM1	12/07/95
Unit 052 (Administration)	Safety and Emergency Equipment Inspection Record	Monthly	0XM2	11/24/97
Unit 105	Safety and Emergency Equipment Inspection Record	Monthly	1RM2	04/02/97
Unit 106	Safety and Emergency Equipment Inspection Record	Monthly	1RM3	04/02/97
Unit 104	Safety and Emergency Equipment Inspection Record	Monthly	1RM4	12/08/95
Unit 255/055	Safety and Emergency Equipment Inspection Record	Monthly	2RM1	12/08/95
Unit 535	Safety and Emergency Equipment Inspection Record	Monthly	5SM2	04/02/97
Unit 604	Safety and Emergency Equipment Inspection Record	Monthly	6RM1	04/02/97
Perimeter and General Facility Inspection Record		Monthly	AMM1	11/24/97
General Facility - Safety and Emergency Equipment Inspection Record		Monthly	AMM2	11/24/97
First Aid Equipment - Safety and Emergency Equipment Inspection Log		Monthly	AXM1	11/24/97
General Facility - Safety and Emergency Equipment Inspection Record		Monthly	AXM2	12/12/95
Units 601, 602, 604 - Tank AWFCO Inspection Record		Semi-Annually	6ES1	11/24/97
Unit 602/604 - Tank Ultrasonic Thickness Inspection Record		Annually	6MA2	11/24/97
Unit 601, 602, 604 - Tank Visual and Hydrostatic Test Inspection Record		Every Four Years	6M41	11/24/97

Insert Inspection Form 01D1

Insert Inspection Form 1RD2

Insert Inspection Form 1RD3

Insert Inspection Form i5SD3 (page 1 of 2)

Insert Inspection Form i5SD3 (page 2 of 2)

Insert Inspection Form 6RD1 (page 1 of 2)

Insert Inspection Form 6RD1 (page 2 of 2)

Insert Inspection Form ARD1

Insert Inspection Form 1RW2

Insert Inspection Form 1RW3

Insert Inspection Form AXW1

Insert Inspection Form IDLE

Insert Inspection Form 0IM2

Insert Inspection Form OLM1

Insert Inspection Form 0MM1

Insert Inspection Form ORM1

Insert Inspection Form OSM2

Insert Inspection Form 0XM1

Insert Inspection Form 0XM2

Insert Inspection Form 1RM2

Insert Inspection Form 1RM3

Insert Inspection Form 1RM4

Insert Inspection Form 2RM1

Insert Inspection Form 5SM2

Insert Inspection Form 6RM1

Insert Inspection Form AMM1

Insert Inspection Form AMM2

Insert Inspection Form AXM1 (page 1 of 2)

Insert Inspection Form AXM1 (page 2 of 2)

Insert Inspection Form AXM2

Insert Inspection Form 6ES1

Insert Inspection Form 6MA2

Insert Inspection Form 6M41

As a result of the idling of the management units identified in Condition X.B.1., the following management units in the table below will be the only units active or partially active.

Unit No.	Description
033	Respirable Air, Utilities, Auxiliaries
038	Fire Water Pump Building
043	Emergency Alarm System and Security
044	Communications System
051	Guard House
052	Administration Building and Laboratory
053	Truck Sampling Station
054	Truck Scales
055	Rail Scales
061	Maintenance Building
104	Intermodal Container Transfer
105	Thaw Unit
106	Bulk Solids Storage
255	Rail to Truck Transfer
535	Waste Fuel Tank Farm Rail Tanker Unloading
604	Truck Wash

Section 5: Attachment 5 - Training Plan

The Permittee is subject to Attachment 5 of the Permit issued November 1, 1991, as amended, with the following exceptions. The exceptions are applicable only when the staffing at the Clive Facility is reduced to less than 50 employees due to the idling of portions of the facility. During these periods, the Permittee may make the following changes to the responsibilities of the following employees. The Permittee is required to maintain the following changes as part of the operating record:

- The responsibilities of the Facility Manager and the Operations Manager are fulfilled by the same employee, unless another Safety-Kleen employee is assigned the responsibility and title of Operations Manager.

- The responsibilities of the Operations Manager and the Training Director are maintained by the same employee, unless another Safety-Kleen employee is assigned the title and responsibility of Training Director.

It should be noted that during periods of time when portions of the facility is idled, not all of the positions listed in the Training Plan will be filled.

Section 6: Attachment 6 - Preparedness and Prevention Plan

The Permittee is subject to Attachment 6 of the Permit issued November 1, 1991, as amended, with the following exceptions.

When a unit is idled, the following equipment will not be required to be maintained in the idled unit:

- External Communications. Note, however, that the PA System and internal communication systems will be maintained plant wide
- Emergency Equipment
 - ▶ Portable fire extinguishers
 - ▶ Automatic fire control/deluge systems {Fire hydrants without hoses and hoses in the hose cabinets will be maintained throughout the facility}
 - ▶ Spill control equipment and decontamination equipment
 - ▶ First aid kits
- Emergency power systems
- Supplied Air Breathing System - SCBAs and Cascade air breathing systems will be used instead of the Supplied Air Breathing System, even in the active portions of the facility when required.
- Ventilation and heating systems
- Vapor control and nitrogen blanketing systems

Section 7: Attachment 7 - Contingency Plan

Attachment 7 is reissued in its entirety with the exception of the Coordination Agreements found in Appendix B. The reissuance of the Contingency Plan is due to modification of the emergency equipment location drawings which were modified to reflect the elimination of the warning sign requirement on hazardous waste management units within the fence line of the facility.

When a unit has received official designation of idled status from the Executive Secretary, the following equipment/items will not be required to be maintained in the idled unit.

- Emergency Equipment or External Communications Systems
- Overpack drums in idled container management units
- Absorbent
- Firewater systems (except fire hydrants and hose cabinets will be maintained)
- Safety Shower and Eyewash Stations
- SABS (Supplied Air Breathing System) - SCBAs and Cascade air breathing systems will be used instead of the SABS even in the active portions of the facility when required.
- First aid stations and kits.
- Decontamination kits & Absorbent kits

When the personnel at the facility is less than fifty, the following personnel changes are applicable:

The responsibilities of the Facility Manager and the Operations Manager are fulfilled by the same employee, unless another Safety-Kleen employee is assigned the responsibility and title of Operations Manager.

In addition, the responsibilities of the Operations Manager and the Training Director are fulfilled by the same employee, unless another Safety-Kleen employee is assigned the title and responsibility of Training Director.

Only the first aid station in the Maintenance Building (Unit 061) is required to be maintained as long as the idling has reduced the Clive personnel to fifty (50) employees or less.

The following drawings illustrate portions of the facility where there are both active and idled units. The drawings illustrate the emergency equipment locations for these areas. Drawings are not provided for areas or units that are completely idled, since inspections of the emergency equipment in idled units are not required. The drawings follow the table.

Drawing No.	Description	Revision No. & Date
43-99-3-003-1	Emergency Equipment Locations - Unit 033 Respirable Air, Utilities, & Auxiliaries Building;	Rev 0, 12/3/97
43-99-3-005A-1	Emergency Equipment Locations - Units 052 & 053 Administration Bldg/Lab & Sampling Station, Grade Level;	Rev 0, 12/3/97
43-99-3-005B-1	Emergency Equipment Locations - Unit 052 Administration Building, 2nd Floor;	Rev 0, 12/3/97
43-99-3-007A-1	Emergency Equipment Locations - Unit 061 Maintenance Building, Grade Level;	Rev 0, 12/3/97
43-99-3-007B-1	Emergency Equipment Locations - Unit 061 Maintenance Building, 2nd Floor;	Rev 0, 12/3/97
43-99-3-017A-1	Emergency Equipment Locations - Unit 254 Ash Accumulation Building, Grade Level;	Rev 0, 12/3/97
43-99-3-025-1	Emergency Equipment Locations - Units 071, 537, 601, & 602 - MCC Unit, Fuel Oil Storage, Aqueous Waste Storage, & Aqueous Waste Blending;	Rev 0, 12/3/97
43-99-3-032	Emergency Equipment Locations - Unit 106 Containerized Bulk Solids Storage;	Rev 3, 04/1/97
43-99-3-038-1	Emergency Equipment Locations - Units 992 & 072 Burner Kiln & MCC, Grade Level;	Rev 0, 12/3/97

Insert drawing no. 43-99-3-003-1

Insert drawing no. 43-99-3-005A-1

Insert drawing no. 43-99-3-005B-1

Insert drawing no. 43-99-3-007A-1

Insert drawing no. 43-99-3-007B-1

Insert drawing no. 43-99-3-017A-1

Insert drawing no. 43-99-3-025-1

Insert drawing no. 43-99-3-032

Insert drawing no. 43-99-3-038-1

Section 8: Attachment 8 - Closure Plan

The permit modification to idle portions of the facility did not affect Attachment 8 of the Permit. The Permittee is subject to Attachment 8 of the Permit issued November 1, 1991, as amended.

Note that many of the steps taken to idle a unit are identical to those required in the Closure Plan. When the steps taken to idle a unit are duplicated by the Closure Plan, and the unit proceeds from idled status to closure, the Permittee is not required to repeat these steps when initiating closure procedures if they were successfully completed during the idling process. For example, if the bulk solids shredders are to undergo closure from an idled mode, the shredders will not require 10 tons of limestone to be fed through each of the shredder units, since this was accomplished prior to the shutdown of the incineration train.

In addition, since each combustion unit was fired at operating conditions on clean fuel for two (2) hours immediately prior to starting cool down on March 28, 1997, this procedure would not need to be repeated. Similarly, if a sub-unit of Unit 106 has been cleaned to the standard specified in the Closure Plan, which is incorporated into the idling procedures, the sub-units would not be required to be cleaned again.

Note however, that if the Permittee decides to manage waste generated at the site for 90 days or less in an idled unit, the cleaning procedures specified in the Closure Plan (Attachment 8) will have to be repeated. Further, if the Permittee uses an idled container management unit as a transfer facility, the cleaning procedures specified in the Closure Plan (Attachment 8) will also have to be repeated.

Section 9: Attachment 9 - Container Management

The Permittee is subject to Attachment 9 of the Permit issued November 1, 1991, as amended, with the following exceptions.

During an idled mode, a container management unit:

- will be heated (when necessary) with portable heaters when the incineration system is idled. This is applicable to Units 101, 102 and 105.
- will be able to hold waste that is manifested to another facility for a period of ten days or less and will be able to hold waste generated at the

facility for a period of 90 days or less. An inventory of these vehicles/containers will be maintained and updated daily with the vehicle/container number, where on the site they are located, the date they arrived and the date they leave the facility.

- will not store containers.

When Unit 101 is idled, container management units remaining active may use a manual waste tracking system that is updated at the end of the shift, instead of a real-time waste tracking system. A unique identifier will be assigned to each container. This number and the date it was received will be placed on the container. The storage location will be as defined in Attachment 9.

When the status of a unit has been changed to idle, the following equipment/items will not be required to be maintained in the idled unit.

- Heat and ventilation
- Emergency Equipment as indicated in the Attachments 6 & 7 sections of this appendix.

When a container management unit has been idled, the following additional inspection requirements are necessary.

- Within 24 hours of a rain event, all idled container management buildings will be inspected for leaks. Water may be allowed to evaporate and the leaks will be repaired within ten days of documenting the leak in the building.
- Concrete coatings will be maintained in idled container management units and will be inspected monthly.

Section 10: Attachment 10 - Container Management Drawings and Details

The Permittee is subject to Attachment 10 of the Permit issued November 1, 1991, as amended with the following exception.

- Nuclear level gages may be removed.

Section 11: Attachment 11 - Tank Management

The Permittee is subject to Attachment 11 of the Permit issued November 1, 1991, as amended, with the following exceptions.

When a tank management unit is idled:

- Precipitation accumulated in containment may be managed in accordance with Condition X.D.2.
- the ventilation/vapor control systems may be turned off.
- the sump pumps will be locked out to prevent pumping sump water to tanks.
- the heat tracing and tank heaters may be turned off.
- the inspections of the idled tank system will be in accordance with Section 4 of this appendix. Inspections to verify the integrity and condition of the idled tank systems will be conducted monthly. This will include a visual inspection of the 251 tank leak detection system.
- the inspections for non-idled units may be modified so that the use of the DCS is not required. For example, if the DCS is idled, overfill control systems of non-idled units will be tested by simulating a high level on the float switch to demonstrate that the overfill control system functions.
- Dust collection systems and carbon absorption systems do not have to be operated nor do the carbon systems have to be tested for break through.
- Nuclear level gages may be removed.
- Units 251 and 252 will be inspected monthly or within 24 hours of a precipitation event, whichever is more frequent, for evidence of leaking. If leaks occur, the water will be allowed to evaporate and the leaks will be repaired within ten days of documenting the leak in the building.

Section 12: Attachment 12 - Tank Specifications

The permit modification to idle portions of the facility did not affect Attachment 12 of the Permit. The Permittee is subject to Attachment 12 of the Permit issued November 1, 1991, as amended.

Section 13: Attachment 13 - Tank Drawings and Details

The permit modification to idle portions of the facility did not affect Attachment 13 of the Permit. The Permittee is subject to Attachment 13 of the Permit issued November 1, 1991, as amended.

Section 14: Attachment 14 - Tank Installation

The permit modification to idle portions of the facility did not affect Attachment 14 of the Permit. The Permittee is subject to Attachment 14 of the Permit issued November 1, 1991, as amended.

Section 15: Attachment 15 - Incinerator Drawings

The permit modification to idle portions of the facility did not affect Attachment 15 of the Permit. The Permittee is subject to Attachment 15 of the Permit issued November 1, 1991, as amended.

Section 16: Attachment 16 - Control Narrative

Attachment 16 is reserved. The permit modification to idle portions of the facility did not affect Attachment 16 of the Permit.

Section 17: Attachment 17 - Trial Burn Plan

The permit modification to idle portions of the facility did not affect Attachment 15 of the Permit. The Permittee is subject to Attachment 15 of the Permit issued November 1, 1991, as amended.

Section 18: Attachment 18 - Instrument Calibration Procedures Plan

During periods when a unit is idled, the instrumentation associated with the unit does not require calibration and maintenance.

Section 19: Attachment 19 - Quality Assurance and Calibration Procedures Plan for Continuous Emission Monitors.

The permit modification to idle portions of the facility did not affect Attachment 19 of the Permit. The Permittee is subject to Attachment 19 of the Permit issued November 1, 1991, as amended, with the following exceptions:

All operations, inspections and maintenance requirements for the CEMS are suspended as long as the incineration system (Units 991 - 998) is idled. Prior to reactivating the incineration system, the Permittee is required to be in compliance with Condition X.E.1.b.